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September 12, 2023

## **VIA ECF AND E-MAIL**

Honorable Cathy Seibel
United States District Court
Southern District of New York
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

Re: Wendy Graham, et. al. v. Vassar College, Case No. 23-cv-7692

Dear Judge Seibel:

This firm represents Defendant Vassar College in the above-referenced matter. We write, with Plaintiffs' consent, to request a three-week extension of Defendant's time to respond to the Complaint, up to and including October 13, 2023.

Plaintiffs filed their Class Action Complaint on August 30, 2023. It was served along with a copy of the Summons on Defendant on September 1, 2023. Defendant's deadline to respond to the Complaint based on that original service date was September 22, 2023. However, Defendant and its counsel quickly realized they would need additional time to review the Complaint, investigate the allegations, and address applicable legal arguments. Defendant's counsel emailed Plaintiffs' counsel that same day, asking if Plaintiffs would consent to a three-week extension of time to respond to the Complaint. On September 5, 2023, Plaintiffs' counsel responded by email, agreeing to the extension. The Parties subsequently memorialized their agreement in the attached Stipulation, which Defendant now requests be "so ordered" by the Court.

This is Defendant's first request for an extension of this deadline. The requested relief will not affect any other scheduled dates. This application is being made in good faith and not to cause undue delay.

We thank the Court for its time and attention to this matter, and for its consideration of this application.

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Very truly yours,

SEYFARTH SHAW LLP

/s/ Matthew Gagnon

Matthew Gagnon

MG:pt

cc: All Counsel of Record (via ECF and e-mail)